

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HILARY REMIJAS and JOANNE KAO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

THE NEIMAN MARCUS GROUP, LLC, a
Delaware limited liability company,

Defendant.

Case No. 14-cv-1735

Hon. Sharon Johnson Coleman

**UNOPPOSED MOTION SEEKING PERMISSION TO EXCEED PAGE LIMITATION
IN MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT AND CERTIFICATION OF
SETTLEMENT CLASS**

Plaintiffs Hilary Remijas and Joanne Kao ("Plaintiffs"), by and through their attorneys, move for an extension of the Local Rules' 15-page limit with respect to their Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Revised Class Action Settlement and Certification of Settlement Class ("Memorandum"). In support of this motion, Plaintiffs state as follows:

1. Plaintiffs respectfully submit that, in order to properly explain to the Court the details of the proposed class-wide Revised Settlement, present the merits of certifying a class for settlement purposes, and adequately address the concerns raised by the Court in its September 17, 2018 Order denying final approval of the previous class action settlement, 35 pages are required. A Memorandum of this complexity and consequence to the proposed class will better aid the Court's consideration of the substantial rights and remedies that Plaintiffs' Motion seeks if it

exceeds the 15-page limitation. Plaintiffs submit that, in these circumstances, it is fair and consistent with the interests of justice to allow for a brief of this length in support of a Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class. There is no prejudice to Defendant Neiman Marcus, and Daniel Craig, counsel for Defendant, represented to Theodore Maya, counsel for Plaintiffs, that Defendant does not oppose this motion.

2. In light of the foregoing, Plaintiffs respectfully request that they be granted leave to file a 35-page Memorandum in support of their Motion for Preliminary Approval of Revised Class Action Settlement and Certification of Settlement Class.

WHEREFOR, Plaintiffs respectfully request that this Court enter an order permitting them to file a 35-page Memorandum in support of their Motion for Preliminary Approval of Revised Class Action Settlement and Certification of Settlement Class.

Dated: October 15, 2019

AHDOOT & WOLFSON, PC

/s/ Tina Wolfson

Tina Wolfson, (*pro hac vice* application granted)

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that the foregoing Agreed Motion Seeking Permission to Exceed Page Limitation in Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class was filed electronically with the Clerk of the Court using the CM/ECF system on October 15, 2019, and served electronically on all counsel of record.

/s/ Tina Wolfson
Tina Wolfson